

WILLKIE FARR & GALLAGHER LLP

BENEDICT HUR (SBN 224018)
bhur@willkie.com
SIMONA AGNOLUCCI (SBN 246943)
sagnolucci@willkie.com
EDUARDO SANTACANA (SBN 281668)
esantacana@willkie.com
DAVID DOAK (SBN 301319)
ddoak@willkie.com
JOSHUA ANDERSON (SBN 312836)
jdanderson@willkie.com
TIFFANY LIN (SBN 321472)
tlin@willkie.com
NAIARA TOKER (SBN 346145)
ntoker@willkie.com
HARRIS MATEEN (SBN 335593)
hmateen@willkie.com
One Front Street, 34th Floor
San Francisco, California 94111
Telephone: (415) 858-7400
Facsimile: (415) 858-7599

Attorneys for Defendant
GOOGLE LLC

SIMMONS HANLY CONROY, LLC

Jason ‘Jay’ Barnes (admitted *pro hac vice*)
An Truong (admitted *pro hac vice*)
Eric Johnson (admitted *pro hac vice*)
112 Madison Avenue, 7th Floor
New York, NY 10016
Telephone: (212) 784-6400
Facsimile: (212) 213-5949
jaybarnes@simmonsfirm.com
atruong@simmonsfirm.com
ejohnson@simmonsfirm.com

LOWEY DANNENBERG, P.C.

Christian Levis (admitted *pro hac vice*)
Amanda Fiorilla (admitted *pro hac vice*)
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 997-0500
Facsimile: (914) 997-0035
clevis@lowey.com
afiorilla@lowey.com

Counsel for Plaintiffs and the Proposed Class
*Additional Counsel listed on signature page.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JOHN DOE I et al. on behalf of themselves
and all others similarly situated,

GOOGLE LLC,

Case No. 3:23-cv-02431-VC
(Consol. w/ 3:32-cv-02343-VC)

**STIPULATION RE: MOTION TO
DISMISS HEARING DATE**

District Judge Vince Chhabria

Pursuant to Civil Local Rules 6-2 and 7-12, and in response to the Court’s Order granting the Parties’ January 18, 2024 Stipulation, as modified (Dkt. 95), Plaintiffs John Doe et al.

(“Plaintiffs”) and Defendant Google LLC (“Google,” and collectively, “the Parties”), by and through their respective counsel, hereby stipulate and agree to the following:

WHEREAS, the Parties’ January 18, 2024 Stipulation set forth the procedural history of Google’s pending Motion to Dismiss the First Amended Complaint (“FAC”), and the hearing on that Motion then set for February 22, 2024 (Dkt. 92);

WHEREAS, the Parties’ January 18, 2024 Stipulation explained that a scheduling conflict was the basis for the Parties’ request to continue the previously-stipulated hearing date to February 29, 2024 at 1:00 PM via Zoom, but failed to specify that the nature of the conflict was as follows: counsel who intend to argue for Google developed a scheduling conflict for the previously stipulated hearing date of February 22, 2024, and counsel who intend to argue for Plaintiffs are unavailable in person on February 29, 2024, but could be available via Zoom (Dkt. 92);

WHEREAS, in granting the Parties’ January 18, 2024 Stipulation as modified, the Court (1) set the hearing on Google’s Motion to Dismiss the FAC for February 29, 2024 at 10:00AM in Courtroom 4, 17th floor at 450 Golden Gate Avenue, San Francisco, CA 94102, and (2) set the next case management conference for March 22, 2024 at 10:00 AM via Zoom (Dkt. 95);

WHEREAS, based upon the Court’s order, the Parties understand that the Court would prefer to hold the hearing on Google’s Motion to Dismiss the FAC in person;

WHEREAS, the Parties have conferred and all counsel could be available in person for the hearing on Google’s Motion to Dismiss the FAC on March 14, 2024;

WHEREAS, the Parties respectfully request that to account for counsel’s availability for an in-person hearing, the Motion to Dismiss hearing be continued to March 14, 2024 at 10:00AM in Courtroom 4, 17th floor.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties to this action and subject to the Court’s approval, that:

1. The hearing on Google’s Motion to Dismiss the FAC shall be set for **March 14, 2024** at 10:00AM in Courtroom 4, 17th floor, or as soon thereafter as is convenient for the Court.

January 30, 2024

WILLKIE FARR & GALLAGHER LLP

By: /s/ Benedict Hur
Benedict Hur
Simona Agnolucci
Eduardo Santacana
David Doak
Joshua Anderson
Tiffany Lin
Naiara Toker
Harris Mateen

Attorneys for Defendant
GOOGLE LLC

January 30, 2024

SIMMONS HANLY CONROY, LLC

By: /s/ Jason 'Jay' Barnes
Jason 'Jay' Barnes
Eric Johnson
An Truong
Attorneys for Plaintiffs
JOHN DOE et al.

January 30, 2024

LOWEY DANNENBERG, P.C.

By: /s/ Christian Levis
Christian Levis
Amanda Fiorilla
Attorneys for Plaintiffs
JOHN DOE et al.

January 30, 2024

KIESEL LAW LLP

By: /s/ Jeffrey A. Koncius
Jeffrey A. Koncius
Paul R. Kiesel
Nicole Ramirez
Attorneys for Plaintiffs

JOHN DOE et al.

January 30, 2024

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

By: /s/ Michael W. Sobol
Michael W. Sobol
Douglas I. Cuthbertson
Melissa Gardner
Jallé H. Dafa
Attorneys for Plaintiffs
JOHN DOE et al.

January 30, 2024

SCOTT & SCOTT, LLP

By: /s/ Hal D. Cunningham
Hal D. Cunningham
Sean Russell
Joseph P. Guglielmo
Ethan Binder
Attorneys for Plaintiffs
JOHN DOE et al.

~~PROPOSED~~ ORDER

The Court hereby enters the following schedule:

1. The hearing on Google's Motion to Dismiss the FAC shall be set for **March 14, 2024** at 10:00AM in Courtroom 4, 17th floor, or as soon thereafter as is convenient for the Court.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 1, 2024



HONORABLE VINCE CHHABRIA
United States District Judge